

**U.S. Department of Justice***United States Attorney  
Southern District of New York*

*Jacob K. Javits Federal Building  
26 Federal Plaza, 37th Floor  
New York, New York 10278*

June 9, 2025

**BY ECF**

The Honorable Jed S. Rakoff  
United States District Judge  
Southern District of New York  
New York, NY 10007

**Re:** *United States v. Carl Erik Rinsch, 25 Cr. 085 (JSR)*

Dear Judge Rakoff:

As directed by the Court during the parties' June 6, 2025 telephonic conference, the Government respectfully submits this letter to request that the Court exclude time to and through December 2, 2025, the date that trial is scheduled to commence, under the Speedy Trial Act. See 18 U.S.C. § 3161(h)(7)(A).

On April 3, 2025, the Court scheduled trial to commence on September 8, 2025, and excluded time to and through that date. On June 6, 2025, the Court adjourned trial, at the request of the defense, until December 2, 2025. The Government requests that the Court exclude time through that date.

The Government respectfully submits that the ends of justice served by this exclusion of time outweigh the best interest of the public and the defendant in a speedy trial. As the Court is aware, the volume of discovery in this case is substantial, and includes hundreds of thousands of pages and several electronic devices. Moreover, the defense has indicated that they anticipate engaging an expert witness. Accordingly, excluding time would serve the ends of justice by permitting the defense additional time to review the discovery, conduct additional investigations into the facts of the case, and prepare for trial.

Respectfully submitted,

JAY CLAYTON  
United States Attorney

By:   
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Cc: Counsel of Record (by ECF)

SO ORDERED

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JSDJ  
6-9-25